



VIA ECF

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-mc-353 (LJL)

Dear Judge Liman:

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this update regarding their letter-motion for an order authorizing service of and responses to, a proposed subpoena to Mazars USA LLP ("Mazars"). *See* ECF No. 89.

Counsel for Plaintiffs and Defendant have conferred and reached an agreement resolving the letter-motion, and avoiding the need for a further motion for leave to file a *broader* subpoena on Mazars in connection with the above-captioned action. Pursuant to the parties' agreement, Defendant consents to service of a revised subpoena, attached hereto as Exhibit A, and the parties have executed a stipulated protective order covering material produced in response to the revised subpoena, attached hereto as Exhibit B.

The parties accordingly request that the Court grant the letter-motion with respect to the proposed subpoena attached hereto as Exhibit A, and enter the proposed protective order attached hereto as Exhibit B.

Respectfully submitted,

s/ Rachel Goodman

Cc: Rebecca Gelozin  
Peter Larkin  
Wilson Elser Moskowitz Edelman & Dicker LLP  
*Counsel to Mazars USA LLP*